

**IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

**UNITED STATES OF AMERICA    )**

**Plaintiff-Appellee            )**

**)**

**v.                                        )**

**)**

**DOCKET NO: 3:19-cr-127**

**CYNTHIA WILLIAMS-                )**

**SINGLETON                                )**

**Defendant-Appellant.            )**

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**MOTION TO EXTEND TIME TO  
SELF-SURRENDER FOR SERVICE OF SENTENCE**

NOW COMES Defendant Cynthia Williams-Singleton, by and through her counsel of record, James W. Kilbourne, Jr., and respectfully requests that this Court to extend the time for her self-surrender to the Bureau of Prisons. As grounds therefor, it is averred:

1. Ms. Williams-Singleton was sentenced by this Court to a term of twenty-seven months of incarceration on January 30, 2020, and the judgment was issued the following day, January 31, 2020. The Court held a hearing pursuant to Fed. R. Cr. P. 35(a) on motion of the defense on February 11, 2020 and left the sentence undisturbed.

2. On February 28, 2020, Ms. Williams-Singleton filed an Unopposed Motion to Extend Time to Self-Surrender for Service of Sentence, which was granted by this Honorable Court on March 4, 2020, extending her reporting deadline to April 1, 2020.

3. On March 23, 2020, Ms. Williams-Singleton filed a Second Motion to Extend Time to Self-Surrender for Service of Sentence for concerns involving COVID-19, which was granted by this Honorable Court on March 24, 2020, extending her reporting deadline to May 1, 2020.

4. On March 25, 2020, the United States filed a Motion to Extend Time to Self-Surrender for Service of Sentence at the request of the Bureau of Prisons for concerns involving COVID-19, which was granted by this Honorable Court on March 25, 2020, extending her reporting deadline to July 1, 2020. The Bureau of Prisons indicated that it may be necessary to request further extension.

5. The undersigned was appointed counsel for Ms. Williams-Singleton by the Fourth Circuit Court of Appeals on May 21, 2020.

6. Currently, Ms. Williams-Singleton is the primary caregiver for her minor daughter and her grandmother. She has been attempting to make arrangements for the care of both during her incarceration.

7. Because of the quarantine restrictions during the COVID-19 pandemic, much activity was stopped, and travel restrictions prevented Ms. Williams-Singleton from completing the required arrangements.

8. During the epidemic, nursing homes have been particularly hard hit and stopped accepting new patients. Assuming restrictions continue to abate, Ms. Williams-Singleton has obtained a bed for her Grandmother in a New York area facility on August 15, 2020.

9. Ms. Williams-Singleton's sister has agreed to care for the Defendant's minor daughter. Unfortunately, travel restrictions related to COVID-19 prevented Ms. Williams-Singleton or her sister from travelling. The current plan is for Ms. Williams-Singleton's sister to travel to South Carolina when the travel restrictions are lifted in New York. When the school year begins, Ms. Williams-Singleton's daughter will travel with her sister to New York for the school year.

10. Appellant requests an extension to September 1, 2020 to voluntarily report.

11. The Government defers to the Court on this motion.

WHEREFORE, for the above-stated reasons, Ms. Williams-Singleton to extend the time for her self-surrender to the Bureau of Prisons.

This the 15<sup>th</sup> day of June, 2020.

s/ James W. Kilbourne, Jr. \_\_\_\_\_

James W. Kilbourne, Jr.

N.C. State Bar No. 24354

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